

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

Motion Picture Association of America, Inc.)	
)	
v. Petitioner,)	Case No. 02-1033
)	
The Register of Copyrights, <i>et al.</i>)	
)	
Respondents.)	

<i>Consolidated With</i>)	
)	
Independent Producers Group, <i>et al.</i>)	
)	
v. Petitioner,)	Case No. 02-1040
)	
The Librarian of Congress, <i>et al.</i>)	
)	
Respondents.)	

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

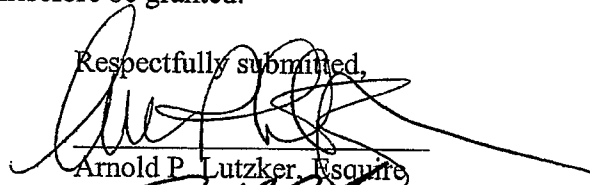
Undersigned counsel for Independent Producers Group and Independent Producers Group Represented Program Suppliers ("IPG"), Arnold P. Lutzker and Carl H. Settlemyer, III of Lutzker & Lutzker LLP ("L&L"), respectfully move this Court for leave to withdraw their appearance as counsel for IPG. L&L has sought, but has not secured, IPG's consent to the instant motion.

The undersigned hereby certify that they have served a copy of the instant Motion on IPG at the addresses shown in the Certificate of Service attached hereto. They further certify that they have given IPG notice advising it to retain other counsel, have notified


IPG of their intention to file the instant Motion and advised IPG to obtain other counsel, or, if IPG intends to conduct the case pro se or to object to the withdrawal, to so notify the Clerk in writing within five days of service of the instant Motion.

The undersigned aver that the requested withdrawal would not occasion any undue delay, be unfairly prejudicial to any party, or otherwise not be in the interests of justice. In particular, the undersigned aver that the briefing schedule on the above-captioned appeals has been suspended so that settlement discussions may proceed. Accordingly, the undersigned's withdrawal as counsel for IPG can be effected without material prejudice to IPG, and should therefore be granted.

Respectfully submitted,



Arnold P. Lutzker, Esquire


Carl H. Settlemyer, III, Esquire

LUTZKER & LUTZKER LLP
Suite 450
1000 Vermont Avenue, N.W.
Washington, D.C. 20005
Phone: 202-408-7600
Fax: 202-408-7677

January 17, 2003

Attorneys for Independent Producers Group
And Independent Producers Group
Represented Program Suppliers